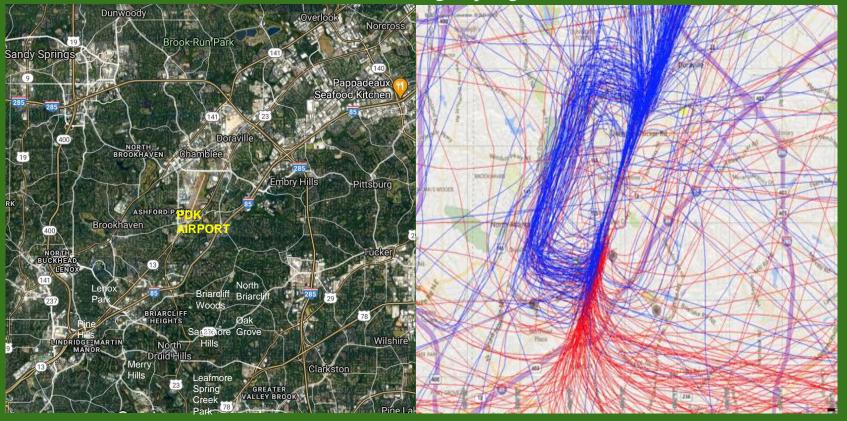
Peachtree-DeKalb Airport 2020-2040 Master Plan – Meetings with Dekalb County Commissoners Fall 2020 through Spring 2021



PowerPoint Presentation by Jaime Dutro, Revised April 2021

PDK - Commissioner Presentations

Introduction and Historical Background (Separate Document)

- 1. Communications and Public Input
- 2. Operations Forecast and Master Plan Alternatives
- 3. Critical Aircraft and the 1,000-foot Runway Safety Extension
- 4. Public Safety, Cost-Benefit, and Quality of Life
- 5. Environmental Issues

Background: excerpts from FAA Advisory Circular 150/5070-6B, page 17, italics and highlighting added)

- "An effective public involvement program should provide these stakeholders with an early opportunity to comment, *before major decisions are made*; provide adequate notice of opportunities for their involvement; and should provide for regular forums throughout the study."
- "Public involvement has its greatest impact during the early stages of the planning process, before irreversible decisions have been made and while many alternatives can be considered. When the stakeholders become involved before major decisions or commitments are made, the planners can better deal with issues of community concern and improve the chances of reaching a consensus on controversial matters.
- "The tendency, instead, will be *for planners to merely defend previously determined courses of action*, rather than exploring any new alternatives. An effective public involvement program will usually avoid such an undesirable outcome.

Following is from a post September 10, 2020 by Jordan Fox, CAC member from District 2:

"Chief among our concerns is lack of communications with us as committee members, and citizens as a whole. DeKalb County specifically hired the PR firm, Smartegies, yet many residents are still in the dark about the important discussions that are happening regarding the Master Plan for the second busiest airport in Georgia. CAC meetings and the Open Houses that have taken place to date have largely been high level PowerPoint presentations lacking detail critical for the committees and the public to give recommendations to the planning team, and our elected representatives. It gives the impression that the airport is really not interested in a collaborative process and is doing the bare minimum to say they went through the process and then move forward."

We have consistently requested agendas and presentation materials in advance of committee and public meetings in order to be prepared and to provide information to our neighborhoods; for the first time, we received the power point for CAC meeting #5 – one day in advance.

Committee meetings were not advertised to the public; PDK claims they are not subject to the Open Meetings Act. With so few public involvement events and demonstrated poor communications, these were missed opportunities at important informational milestones.

Master Plan Timeline

Nov 7, 2018 CAC Meeting #1 - Introduction to master planning process, Survey of committees

Nov 15, 2018 First Open House - Introduction to process

Mar 19, 2019 - Working Paper #1 available - Aviation forecasts

Mar 26, 2019 CAC Meeting #2 – Forecasts; Smartegies survey results

Jul 11, 2019 CAC Meeting #3 – Critical Aircraft determined; Facility requirements to meet forecasts

Jul 18, 2019 Public "Workshop" Open house format

Dec 5, 2019 CAC Meeting #4 Presentation of alternatives (WP#2 & 3 info)

Jul 28, 2020 CAC Meeting #5 Alternatives chosen; Impact of Covid; Phasing Plan (precursor of ALP) released There had been no further working papers publicly available since Working paper #1.

Working Paper #2 has been promised

Aug 18, 2020 GORA Request Submitted - For docs/communications subsequent to WP#1. Nothing as of Nov 21)

Dec 8, 2020 10pm Working Papers #2 & #3 made available

Dec 10, 2020 - Last Public Information Meeting; Only 4 of 11 Master Planning tasks had been completed at that time.

Public Involvement - Feedback

Fall 2018 Smartegies Public Survey Results

 Questions were carefully worded but, to the question regarding "concerns," the top three highest percentages of respondents "very or somewhat concerned":

Noise at **69.9**%.

Future Construction and Expansion at 66.9%

Diminished Greenspace at 57.8%

A majority of respondents, 52.8%, commented that pollution, noise, low-flying aircraft, and/or location of the airport in a
residential area as weaknesses of PDK.

An Independent Survey Results

 In a NextDoor survey of Sagamore Hills and surrounding neighborhoods south of the airport, when provided with the Baker growth forecasts,:

84% of the 180 respondents wanted zero or limited growth at PDK, **53%** said zero, **31%** limited)

Sagamore Hills Civic Association Board – Unanimously opposed expansion Sagamore Hills Civic Association Membership – 86% opposed to expansion

More surveys of surrounding neighborhoods was needed.

Outreach to neighborhood association meetings was needed

Issues

- Citizens Advisory Committee had no role in advising; 3 CAC members issued a letter to the BOC 08/18/20.
- CAC/TAC/ICC and Public Meetings "completed" before even half the Master Plan was complete.
- Agendas and information was rarely, if at all, published in advance of CAC or Public Meetings to allow time for review and comment. Example: Master Plan Working Papers issued to the public many months after completion and WP#2 & 3 only less than 48 hours before the last Public Meeting. "Too technical."
- Open Records Request of Aug 18 in effort to get information on Master Plan progress; still unanswered.
- All decisions have been made without public input prior to being presented as a 'fait accompli' at meetings.
- A schedule or date for completion of the Master Plan is reported as "not available" at AAB Meetings.
- AAB Meeting minutes are available, but links to Zoom recordings of the meetings were broken; when requested in March 2021 to be made available, they were then password protected.

Actions:

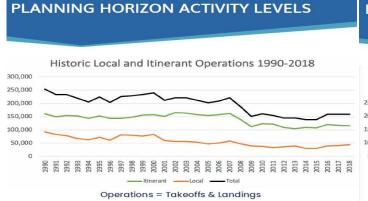
- More Public Meetings are justified, with adequate advance notice and full content published well in advance.
- Require that all work product of the Master Plan be made public immediately including, but not limited to, drafts of Working Papers completed or in progress.
- Require a minimum of six (6) months public review of the Master Plan prior to consideration for approval by the BOC.
- Undertake extensive third-party independent public surveys of residential neighborhoods affected by airport operations.
- Provide public access to Zoom recordings of AAB Meetings.

Background:

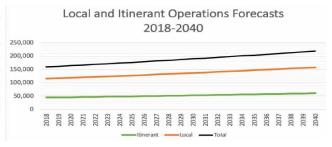
- Operations and Based-Aircraft Forecasts are used to justify improvements and expansion plans.
- Alternatives are generated to provide decision makers with solutions based on these forecasts.

Issues:

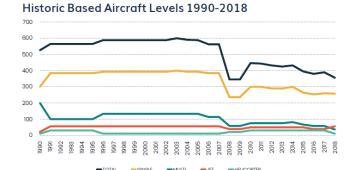
- PDK is proposing a forecasted average annual growth of operations at three (3) times the FAA TAF Forecast.
- PDK's proposed based-aircraft forecasts do not reflect a *balance* of the needs of aviation with the environment and the interests of surrounding neighborhoods as *required* by per FAA Order-5090-5-NPIAS-ACIP.
- Demand for based-aircraft at PDK is self-generating "if you build it, they will come." This approach does not respect the balance noted above.
- "Annual Service Volume (ASV)" calculations based on aggressive forecasted operations are used to justify capacity expansion projects.
- Jet operations have a significantly larger impact on more heavily populated residential areas to the south and north because their speed lengthens the landing approach leg.



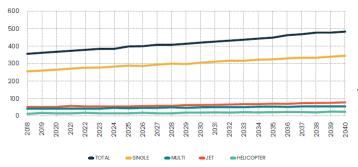
PLANNING HORIZON ACTIVITY LEVELS



Do historically declining operations mean future growth in ops?







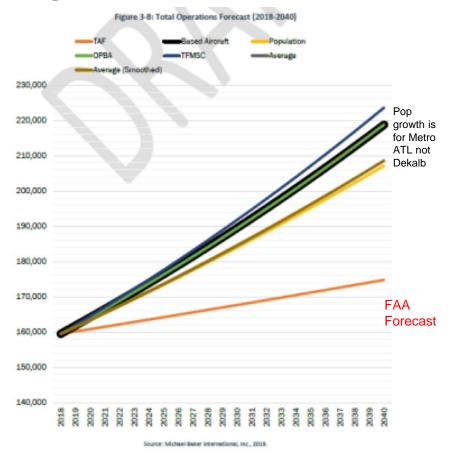
Do historically declining based aircraft levels justify future growth?

Excerpt from FAA Order-5090-5-NPIAS-ACIP

"Order 5090.5 establishes guidelines for managing and maintaining two federal plans that are essential to airport development: the National Plan of Integrated Airport Systems (NPIAS) and the Airports Capital Improvement Plan (ACIP)."

Table 1-1A Essential Airport Characteristics

Airports Should Be	Characteristics
Safe	Developed and maintained to appropriate design standards.
Efficient	Located to provide ease of access and enhance usage.
Affordable to both the users and the government	Relies primarily on producing self-sustaining revenue with minimal burden on the general revenues of the local, state, and federal government. As stated in Executive Order 12893, federal investment will be based on analysis of expected benefits and costs.
Flexible and expandable	Can meet changes in demand and accommodate evolving needs, including but not limited to aircraft designs, airline service strategies, and aeronautical activities.
Permanent	Ensures it will remain open for aeronautical use over the long term
Compatible with surrounding communities	Maintains a balance between the needs of aviation, the environment, and the interests of neighboring areas.
Adaptable to new technology and airspace changes	Developed in concert with improvements to the air traffic control system and associated technological advancements.



Master Plan forecsted increases of concern:

Based-aircraft total:

From 355 in 2018 to 487 by 2040 (28%)

Based Aircraft Jets:

From 46 to 74 (38%).

Jet operations:

From 39,729 to 64,125 (60+%)

Larger Impact of jets on residential neighborhoods:

Longer final approach leg

Working Paper #1 dated 3/1/2019 - Analysis

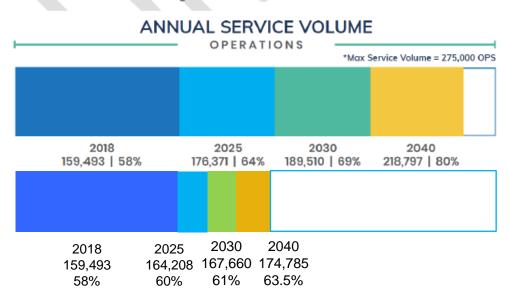
- "The FAA Aerospace Forecast Fiscal Years 2018-2038 projects virtually no growth in the nationwide GA [General Aviation] fleet from 2018 to 2038 and a decline in fixed-wing piston aircraft." The FAA Terminal Area Forecast (TAF) only projects operations growth of 0.42% average annual growth rate (AAGR) for PDK, but the Baker paper projects 1.45% AAGR.
- O Population growth over the time period for the 10-county metro region is reported at only 1.20%, Dekalb at only 0.73% AAGR. Other factors used such as rental car revenue on site, national aircraft demand based on 2017-2018 only, and fuel sales projected from a period of strong economic recovery since the 2008 recession are referenced as justification for overly-optimistic continued strong growth. The pandemic and resultant expected permanent changes in working remotely will continue to dampen business travel demand.
- The FAA AAGR for based-aircraft is however 1.30%, while Baker projects 1.45% and notes that "...the ability to provide hangar space is the only factor affecting the growth in based aircraft at PDK." The amount of hangar space at PDK Airport is something that PDK, the City of Chamblee, and the County control entirely.
- Recognizing that because of FAA regulations, PDK cannot restrict operations of aircraft landing and departing other than
 for safety reasons, one of the few protections for residents in the surrounding area is to limit the number of aircraft based at PDK.

Annual Service Volume (ASV) of an airport "is used primarily as a tool in the airport planning process to identify the need for advanced planning of airfield capacity relief." The "planning, design, and construction of the new facilities may by timed more effectively."

The following guidelines are typically utilized during master planning to define recommended "capacity improvement" actions at percentages of annual operations to the ASV: At 60% ASV – Planning should begin. At 80% percent – Planning should be complete and construction be initiated. At 100% ASV – Improvements should be completed prior to this point.

The result of incorporating aggressive forecasts in the Master Plan is to justify capacity improvements that don't respond to operational increases but create them.

- Figure 4-1, graphically illustrated the airport's ASV.
(From WP#2, Chap 4.5.2 Annual Service Volume)
Figure 4-1: Annual Service Volume



DeKalb Peachtree Airport Airport Master Plan Update



Year	Year +	Operations			Based Aircraft		
		TAF	Recommended	Difference	TAF	Recommended	Difference
2018	0	135,455	100,400	0.00%	355	3.55	0.00%
2019	1	160,158	161,801	1.03%	360	360	0.13%
2020	2	160,826	164,143	2.06%	364	365	0.26%
2021	3	161,497	166,519	3.11%	369	371	0.40%
2022	4	162,170	168,929	4.17%	374	376	0.53%
2023	5	162,847	171,374	5.24%	379	381	0.67%
2024	6	163,526	173,855	6.32%	384	387	0.80%
2025	7	164,208	176,371	7.41%	389	392	0.94%
2026	8	164,892	178,924	8.51%	394	398	1.08%
2027	9	165,580	181,514	9.62%	399	404	1.22%
2028	10	166,271	184,141	10.75%	404	410	1.36%
2029	11	166,964	186,806	11.88%	409	416	1.50%
2030	12	167,660	189,510	13.03%	415	422	1.64%
2031	13	168,360	192,253	14.19%	420	428	1.79%
2032	14	169,062	195,036	15.36%	426	434	1.94%
2033	15	169,767	197,859	16.55%	431	440	2.08%
2034	16	170,475	200,722	17.74%	437	447	2.23%
2035	17	171,186	203,628	18.95%	443	453	2.38%
2036	18	171,900	206,575	20.17%	448	460	2.53%
2037	19	172,617	209,565	21.40%	454	466	2.68%
2038	20	173,336	212,598	22.65%	460	473	2.84%
2039	21	174 059	215.675	23.91%	466	480	2.99%
2040	22	174,785	218,797	25.18%	472	487	3.15%
			Average Annual G	rowth Rate (AAGR)		
2018-2038	N/A	0.42%	1.45%	N/A	1.31%	1.45%	N/A
2018-2040	N/A	0.42%	1.45%	N/A	1.31%	1.45%	N/A
2020-2040	N/A	0.42%	1.45%	N/A	1.31%	1.45%	N/A

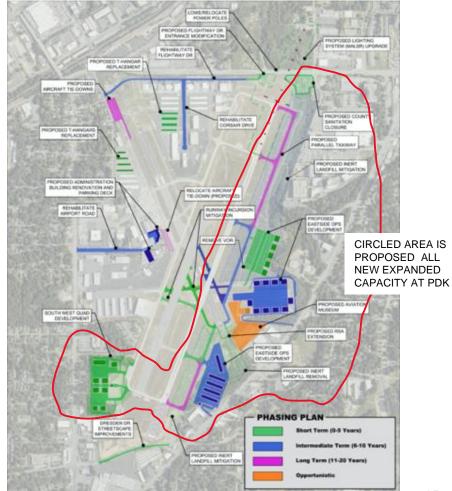
Table 3 16: Enrecast Summary (2019 2040)

Actions:

- Base the Master Plan on more probably FAA TAF forecasts.
- PDK's Master Plan alternatives based on their forecasts for *some* improvements on a case-by-case review as long as they are not intended to increase capacity or aircraft size.
- Eliminate based-aircraft capacity expansion in the east operations area and the SW quadrant.
- Explore alternative revenue-generating alternatives for the east ops area and leave the SW Quadrant in its intended-use state revegetated as a buffer, things like the museum is good.

Proposed Airport Layout Plan (ALP)

- FAA requires approved ALP to provide and approve funding for any aviation-related project.
- Plan includes largest expansion of aircraft tie-downs and hangars in PDK history.



- The Critical Aircraft in a Master Plan is the largest, heaviest aircraft with over 500 operations per year for the base year of the Master Plan. The current draft Master Plan designates the Gulfstream 550 at 91,000 lbs MTOW.
- The Critical Aircraft becomes the basis of design for improvements on the Airport Layout Plan (ALP), including runway design, except where "geometric feasibility" constraints exist.
- Dekalb County Code Sec. 6-93. Dirigibles, blimps, gliders, etc.
 "Prior authorization is required before airships, dirigibles, blimps, gliders, free balloons, motorless aircraft or aircraft with a total gross weight in excess of seventy-five thousand (75,000) pounds land or take off at the airport.
 (Code 1976, § 6-4077)"
- PDK reported 2,028 (average) annual operations by aircraft over 75,000 lbs MTOW for 2018-2020 and concluded that these aircraft could use the main runway 3R-21L "without restrictions." (AAB Meeting Feb 8, 2021) All of those aircraft require the 1,000-foot runway safety extension for unrestricted take-offs.

A report presented at the Feb 8, 2021 AAB on Aircraft Classification Number (ACN) and Pavement Classification Number (PCN) explained at the Feb 8, 2021 AAB concluded:

These results show that any of the aircraft from the 2018-2020 fleet mix data and projected 2025 operations can safely use Runway 3R-21L provided that their number of departures are not substantially greater than what was used.

Determining the PCN Operations Fleet Mix Data derived from the 2018, 2019, 2020, and 2025 (projected) operations were used to evaluate the given aircraft that can operate without restrictions on the runway payement. The most demanding aircraft using the airport include: Manufacturers' 2025 Take-Off 2018-2020 Projected **MTOW** Distance Aircraft ACN Operations Operations (lbs) (ft) Gulfstream G-IV 27 1,137 1.268 75,000 5,650 Gulfstream G-500 29 8 9 79,600 5.300 Gulfstream G-550 32 660 735 91,000 5.910/7.220 Gulfstream G-650 65 38 58 99,600 6,290 Global Express 5500 35 140 156 92.500 5,490 Global Express 6500 38 253 282 99,500 6,370 2,028 2,515 "PRIOR PERMISSION" OPERATIONS

3. Critical Aircraft and the 1,000-foot Runway Safety Extension Issues, continued:

• Assurances that aircraft greater than 66,000 lbs dual-wheel MTOW would not operate at PDK were important factors of the *CARE Now* opinion that allowed the 1,000-foot runway extension to be built *without* a full Environmental Impact Study (EIS) *but only* with that explicit limitations:

"The terms of the proposed runway extension, however, forbid the introduction of new [*1575] types of aircraft and heavier loads."

"Furthermore, [**12] the proposal expressly maintains the current weight limitation of 66,000 pounds." and "The FAA's findings impose these mitigation measures on DeKalb County as conditions precedent to the construction of the runway extension. This court must consider these mitigation measures because they were imposed as conditions of the agency action. *Louisiana v. Lee*, 758 F.2d 1081, 1083 (5th Cir.1985). FAA consideration of the mitigation measures was not only appropriate, but required."

- There is a long documented history of Dekalb County commitments regarding use of the PDK Safety Extension:
 - 1991-in letter from DeKalb County CEO Manuel Maloof to Noise Abatement Advisory Committee Chair:
 - "... there shall be no lengthening, increase of weight-bearing capacity, or widening of any PDK runway for any reason without an EIS [Environmental Impact Study/Statement] from this time forth. This is, as you know, our policy. There is no intent to change the present capacity or size of the airport." In May 1991 the Board of Commissioners (BOC) approved the policy mentioned in this letter. (letter available on request)
- The 1,000-foot runway safety extension (or "displaced threshold") was *intentionally not structurally designed* as a result of that case for normal operations by aircraft over 66,000 lbs MTOW.
- This substantiates fears of the *CARE Now* petitioners that the final opinion (incorrectly) ruled "unjustified" at that time:
 - "The proposed runway extension is not designed to accommodate operations by aircraft larger than the ones currently using PDK."

Issues:

- The designation of the Gulfstream 550 as the "Critical Aircraft" runs contrary to constraints imposed by the *CARE Now and Feltus v FAA (opinion) (1988)* settled in 1988 limiting aircraft usage to 66,000 lbs Maximum Take-Off Weight (MTOW).
- The GS 550 (and others in its weight class) cannot operate unrestricted from the main runway without utilizing the 1,000-foot runway safety extension. A Gulfstream 550 or any aircraft over the 66,000 lbs MTOW weight limit are not supposed to use PDK *except* under special "Prior Authorization"

1997–from FAR Part 150 Noise Compatibility Study Update: "Aircraft weighing more than 66,000 pounds are prohibited from normal operation at PDK."

• "Bootstrap" effect: The abuse of that settlement agreement to allow more than 500 operations by these larger aircraft, whether intentional or not, becomes justification for larger aircraft as the next Master Plan Critical Aircraft. Despite not being able to take-off at MTOW without use of the safety extension at PDK, it justifies design standards and improvements which would *then allow* 500 ops/year by the next larger class of aircraft operating *empty or lightly loaded*, which weight class then becomes the next Critical Aircraft and so on. That unlimited growth justification cycle is not in the public's interest.

Action:

- The Critical Aircraft weight class at the time of the court decision should remain the predominate standard *for operations and airport basis of design* as a legal (rather than physical) geometric feasibility limitation. The FAA allows that improvements *are not required where it is not geometrically feasible* to accommodate the Critical Aircraft. (FAA AC150/5000-17)
- Justification of runway improvements based on existing (prior permission) usage or selective physical testing of pavement that would increase operations by aircraft larger than 66,000 lbs MTOW should not be accepted.
- When Master Plan and Airport Layout Plan information becomes publicly available, further study is needed to determine design elements or operational limitations needed in consideration of legally required aircraft weight-limit constraints.

(Excerpt from FAA AC150/5000-17)

- 3.13 What Should Be Done if the Existing Critical Aircraft Exceeds the Existing Airport Standards at a Geometrically Constrained Facility?
- 3.13.1 An example of this situation is when the runway-to-taxiway separation distance is insufficient per airport design standards.
- 3.13.2 Because the airport sponsor has responsibilities for airport safety, they should work cooperatively with the FAA through a planning study to evaluate geometric changes to mitigate risk. If geometric changes are not feasible, then Modifications to Standards and operational procedures are needed to ensure safe operations. The airport sponsor

3-4

6/20/2017 AC 150/5000-17

- cannot restrict airport access based on design standards without an FAA determination from ARP and AFS.
- 3.13.3 Once the Critical Aircraft has been identified in accordance with this AC, and the resulting RDC established, then this should be reflected on the ALP as the Critical Aircraft regardless of whether the airport meets that standard and regardless of whether the sponsor plans to reconfigure the airport to meet the standard. The existing Approach and Departure Reference Code (APRC and DPRC) are also identified on the ALP.

4. Public Safety, Cost-Benefit, and Quality of Life Background:

- PDK's continued efforts to expand have historically been in conflict with surrounding residential areas.
- North Dekalb County is rapidly becoming more and more densely populated as it evolves into a major regional medical center; witness the wave of annexations by developers and Small Area Plans proposed.
- Surrounding PDK are many communities with immigrant populations and a large number of school children.
- Other similar urban airports have been demolished (Meigs, Chicago), or constrained and planned closing (Santa Monica, 2028) due to citizen concerns and activism.



4. Public Safety, Cost-Benefit, and Quality of Life

Issues:

- Once again, PDK's proposed historic expansion of facilities do not reflect a *balance* of the needs of aviation with the environment and the interests of changing surrounding neighborhoods as *required* by per FAA Order-5090-5-NPIAS-ACIP.
- Overall economic benefits may also be misleading and don't take into account the negative cost to the County due to lost property tax revenue (Bell Study), health-related costs (Miranda, et al study), or lifetime earnings loss due to IQ loss in children (MIT Study).
- Overly optimistic revenue projections may be misleading: SW Quad development is one example by overestimating by more than double the potential revenue by assuming 100% occupancy completely by brand new aircraft.

4. Public Safety, Cost-Benefit, and Quality of Life

SW Quad Revenue Projections - Questions

SW QUAD HANGAR DEVELOPMENT (UNDER DEVELOPMENT PRIOR TO MASTER PLAN)





\$9,325,800.00

It has a total baggage capacity of 82.00 ft*3; 00.00 ft*3 being internal and 82.00 ft*3 being external. Depending on numerous factors, the average price for a pre-owned CESSNA Citation X is \$9,325,800.00.

www.aircraftcostcalculator.com > AircraftOperatingCosts +

Ownership and Operating Costs | CESSNA Citation X @

CEO / BOC Revenue Enhancement

Proposal for Constructing additional private/corporate hangars at PDK

Owners of airplanes currently housed at private/corporate hangars at DeKalb Peachtree Airport pay property taxes, lease payments and fuel flowage fees to the county and airport.

While the Airport operates as an Enterprise Fund, opportunities exists for the county to generate additional personal property tax revenue by constructing additional hangars. Additional private/corporate hangars would help the county in its efforts to attract companies to DeKalb County in its efforts for economic development and add to the county's commercial tax base long-term.

Proposal is for development of 9 new private/corporate hangars

- Each hangar could have 2 Cessna Citation Ten's based in its hangar
- A Cessna Citation Ten Business Jet aircraft; average cost \$ 23.5M;
- Estimated property tax for Cessna Citation X, \$398,945K/annually; totaling \$7.18M for 18 business jets

Benefits to the DeKalb County 29% / Chamblee 15% / School Board 55% Total Personal Property Tax (Ad Valorem Tax) \$ 7,181,010.00 DeKalb \$119,013.40 (\$2,142,234 for 18 aircraft annually) Chamblee \$ 60.160 (\$1,082,880 for 18 aircraft annually) DeKalb Co School Board \$219.419 (\$3,949,555 for 18 aircraft annually)

Proposal is for development of 9 new private/corporate hangars

- Each hangar could have 2 Cessna Citation Ten's based in its hangar New, but ave is \$9.33M, if fully
- A Cessna Citation Ten Business Jet aircraft; average cost \$ 23.5M; occupied with this aircraft, unlikely
- Estimated property tax for Cessna Citation X, \$398,945K/annually; totaling \$7.18M for 18 business jets

\$158,318/annually

\$2,849,730

Benefits to the DeKalb County 29% / Chamblee 15% / School Board 55%

Total Personal Property Tax (Ad Valorem Tax) \$ 7,181,010.00

DeKalb \$119,013.40 (\$2,142,234 for 18 aircraft annually)

Chamblee \$ 60,160 (\$1,082,880 for 18 aircraft annually)

DeKalb Co School Board \$ 219,419 (\$3,949,555 for 18 aircraft annually)

4. Public Safety, Cost-Benefit, and Quality of Life

Actions:

- Professional critical reviews are needed of cost-benefit, revenue projection, and economic impact studies offered to justify the Master Plan; these should include the negative costs to the public.
- Projects that would clearly result in more operations, or increased operations by aircraft exceeding 66,000 lb MTOW, or expansion of based-aircraft capacity must be balanced against negative environmental and social impacts.
- Incorporate in the Master Plan program limits to reduce the negative impacts on the residential areas surrounding the airport, like slowly phasing out flight schools.

Norma Herd Presentation:

To date, there is no reliable Environmental Study for PDK airport. An Emory Study was rejected as incomplete. and subsequent KB study was also inadequate as documented by Susan Gouinlock, AAL (see referenced documents.)

Airport director Mario Evans, Board members of Open Dekalb Inc., and Commissioner Jeff Rader are currently meeting in a roundtable format with both local and regional representatives from the FAA, the EPA, and GDOT to create an Environmental Study of aircraft emissions and noise impacts of different size air craft operating at PDK. The focus of the study is to provide accurate emissions and noise data broken down into the following different sizes and types of aircraft using PDK in order to determine if there are differences in the amount of polluting emissions and noise impact on the surrounding communities:

- 66,000 lbs MTOW (Maximum Take Off Weight) or less
- 66,000 lbs to 75,000 lbs MTOW
- 75,000 lbs MTOW or greater

These categories to be studied were established in a written contractual agreement made between DeKalb County and the airport and Open Dekalb, Inc.

Open Dekalb, Inc. believes that the Commissioners should *not make any decision on the proposed Airport Master Plan* without a complete review of the Environmental study now in the design phase. Decisions about the growth of PDK airport must be based on accurate environmental data. DeKalb County citizens must have access to this Environmental study as well.

DeKalb County owns PDK airport. The FAA stated at our first roundtable meeting that "the growth of the airport is a *local decision* not the purview of the FAA"

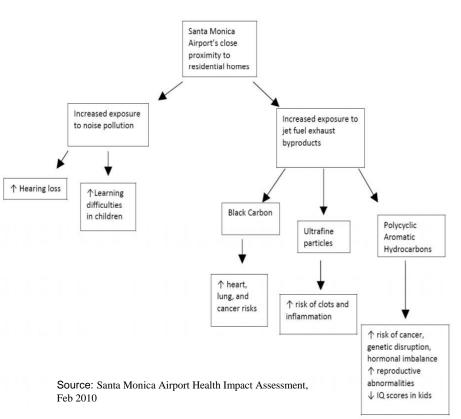
Environmental facts of special note:

- Atlanta and DeKalb County remain in a non-attainment zone for ozone.
- NOx (Nitrogen Oxides) emissions from aircraft are a precursor to the formation of ozone.
- Aircraft emissions at 3000 feet or below drop back down to the earth and mix with other elements in the air which can create hazardous compounds.
- Aircraft emissions above 3000 ft. join the jet stream and contribute to the global air pollution.

Aircraft Pollutants to be studied via Round Table:

- Carbon Monoxide (CO)
- Lead (Pb) Contained in leaded Avgas used by General Aviation, including PDK flight schools; it's considered neurotoxic in children since lead intake goes directly to the brain, impacting learning and IQ.
- Nitrogen Oxides (NOx): ozone formation precursor.
- Particulate Matter less than 2.5 microns (PM 2.5) including ultrafine particles that pass easily into the lungs.
- Sulfur Oxides (SO2)
- Unburned hydrocarbons (HC): 77 individual compounds including 15 that are considered by Section 112 of the Clean air act as being hazardous air pollutants (HAPs) i.e., Benzenes, Toluenes, and formaldehyde, which are all considered carcinogenic.

Figure 5: Health Effects of Santa Monica Airport

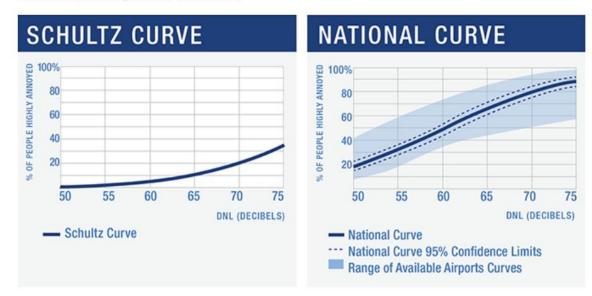


5. Environmental Issues - Noise

A newly released FAA "Neighborhood Survey" found that more of the public is "highly annoyed" by aircraft noise *at much lower levels* that the current FAA standard. Excerpt of that report:

Results

A new National Curve was created by combining the Survey responses from the question on "Noise from Aircraft" with the modeled aircraft noise levels. Compared with the existing Schultz Curve, the new National Curve shows a substantial increase in the percentage of people who are highly annoyed by aircraft noise over the entire range of aircraft noise levels considered, including at lower noise levels.



Source: https://www.faa.gov/regulations_policies/policy_guidance/noise/survey/

5. Environmental Concerns - Noise

CURRENT VS. PREVIOUS CRITICAL AIRCRAFT COMPARISON

G III	WING	MAX. TAKEOFF WEIGHT	NOISE LEVEL (FAA AC 36-IH)	
	78'	69,700 lbs	91.1 dB	
G 5	93.6′	91,000 lbs	80.3 dB	

Note:This is the highest reported – The G III has multiple noise levels, i.e., 84.1 dB with a hushkit

These are TO (Take-Off) Sound Levels. Approach sound levels are significantly higher (ref FAA AC 36-IH): The G III 96.8 dB The G V 90.8 dB

5. Environmental Concerns

Environmental Considerations Master Plan Approvals

Airport Layout Plans (Master Plans) are

Conditionally-Approved, meaning
major Federally-funded projects still
subject to Environmental Review following
completion of Master Plan Environmental
Review (e.g. CATEX, EA). This occurs prior to
implementation of project.



Citizens and the BOC should know the *full* environmental impact of the forecasted plan and level of operations before approving the Master Plan, just like any major phased public or private development.

NEPA requires that a federal agency examine not only the impact directly attributable to one project, but also the cumulative effects of that project.

Piecemeal NEPA environmental studies as proposed in the Master Plan would intentionally minimize the impact of the whole and would not address the main issues of the overall impact of noise and air pollution by undertaking intentionally small projects resulting in a CATEX (Categorical Exclusions) or an EA (Environmental Assessments) that ends up with a FONSI (Finding Of No Significant Impact) but ignore the larger impact of the full Master Plan expansion.

20

Are larger aircraft like the proposed Gulfstream 550 at 93,000 lbs MTOW more polluting or noisier than other aircraft in the fleet?

Are other aircraft, or classes of aircraft producing more pollutants and noise impact on the community?

What is the full environmental impact of the Master Plan now nearing completion?

How can DeKalb County Commissioners make informed decisions on PDK Airport without answers to these questions.

We need answers to these important questions.

CONCLUSIONS

1. Environmental

• Fulfill the requirements of the memorandum of understanding between ODI and Dekalb County to provide a full environmental study that measures air and noise pollution, broken down into three classes of aircraft: those less than 66,000 lbs MTOW, those between 66,000 and 75,000 lbs and those over 75,000 lbs. Piecemeal studies are not acceptable.

2. Communications and Public Input

- There needs to be transparency with all information and timely access to the Master Planning documents and process.
- Significant amounts of time and outside expertise is needed to review the Master Plan before consideration by the BOC and GDOT/FAA.

3. Operations Forecast and Master Plan Alternatives

• Balance with surrounding neighborhoods is critical and completely lacking in the Master Plan effort to date; that needs brought back as soon as possible.

4. Critical Aircraft and the 1,000-foot Runway Safety Extension

• The over-use of Prior Permissions that end up justifying larger and larger aircraft that must use the 1,000-foot runway safety extension contrary to prior assurances needs further review.

5. Public Safety, Cost-Benefit, and Quality of Life

• All cost-benefit, revenue, and economic impact conclusions need careful independent review.

Addendum:

Sagamore Hills Civic Association Motion Approved at its 2020 Annual Meeting:

In the interest of all citizens and to protect the health and well-being of all residents, Dekalb County should include in the PDK Master Plan the following minimum limits on growth and conditions:

- 1. Require a full environmental study of the impact of the proposed Master Plan before it is approved for both noise and air pollution
- 2. Disallow lengthening or structural upgrades to runways, taxiways or facilities to accommodate aircraft larger than 66,000 lb MTOW. (The 1,000 ft displaced the shold should be permanent.) Honor the 1988 FAA/County assurances.
- 3. No commercial cargo services.
- 4. Cap "Scheduled" Charter services at current levels.
- 5. Cap and gradually phase out flight school operations.
- 6. Remove the east-side Ops area and SW Quadrant expansion added hangars and tie-downs from the Master Plan & Airport Layout Plan other than the proposed museum.

References:

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- 3. Summary of PDK Weight Limit Issues Outline for Commissioner Rader (2020): https://drive.google.com/file/d/1Ew36M2Y1B_-h0ymtVj6HCXLTI6cvzrGg/view?usp=sharing
- 4. PDK Weight Limit Detailed Background Evidence (2020): https://drive.google.com/file/d/1Mn7emTcDBtjSkJExFY9Xsc-HbUdGb9_l/view?usp=sharing
- 5. C.A.R.E. Now v. Federal Aviation Administration Decision (1988): https://drive.google.com/file/d/1wsIiqxBw7oNAVuxWAavNAkANkM4vd2gA/view?usp=sharing
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- 7. Structural Engineer's Assessment of PDK Runway Weight Bearing Capacity (2010): https://drive.google.com/file/d/1HO0AwMhvTuuGLf9On9khpoo3_zfs-EvF/view?usp=sharing
- 8. History of PDK Weight Limit Policy: http://opendekalb.org/home/pdk-weight-limit-policy/
- 9. Critique of the Lack of Citizen Involvement with the Master Plan Process https://drive.google.com/file/d/1hNvDKQXTra4S5nrrKULgkCa_gCCZg1lc/view?usp=sharing
- 10. Excessive and Unrealistic PDK Master Plan Projections (2019): https://drive.google.com/file/d/1SqohgQyF4sOOYNZPHKYeHvQe5pQzK7wt/view?usp=sharing
- 11. Randall Bell, "The Impact of Airport Noise on Residential Real Estate," *The Appraisal Journal* (2001): https://nqsc.org/downloads/REALESTATE.pdf

12. Miranda, et al, Study: "A Geospatial Analysis of the Effects of Aviation Gasoline on Childhood Blood Lead Levels," Environmental Health Perspectives (2011): https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3230438/

13. Wolfe, et al, MIT: "Costs of IQ Loss from Leaded Aviation Gasoline Emissions," *Environmental Science & Technology* (2016) https://drive.google.com/file/d/1LZRnRm_hSLJP3sqkypo21oH78Hglxh_B/view?usp=sharing

14. UCLA Santa Monica Airport Health Impact Assessment (2010): https://www.pewtrusts.org/-/media/assets/2010/02/santamonicaairportfinalhia.pdf

15. Santa Monica Airport Closing 2028, *Los Angeles Times* (2017): https://www.latimes.com/local/lanow/la-me-santa-monica-airport-20170128-story.html

16. FAA Neighborhood Environmental Study (2021): https://www.faa.gov/regulations_policies/policy_guidance/noise/survey/

17. "2019 Crash into Townhome," *Reporter Newspapers* (2021): https://reporternewspapers.net/2021/03/03/insurance-payout-resolved-in-2019-pdk-airplane-crash/

Useful Links:

Open Dekalb, Inc:
 http://opendekalb.org/
 http://www.pdkwatch.org/

PDK Airport (unofficial private website):
 https://www.pdkairport.com/
 PDK Airport (Dekalb County Official Site):
 https://www.dekalbcountyga.gov/airport

PDK Master Plan: https://www.pdkmasterplan.com/